

December 21, 2012

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th ST, SW Washington, DC 20554

RE: WT Docket No. 11-49

Ms. Dortch-

I hope this letter finds you well and that you will be able to enjoy some time off this holiday season.

I am writing to you on behalf of Joink, LLC, a small business operating in West-Central Indiana and East-Central Illinois. We operate as a Wireless Internet Service Provider (WISP) in nine rural and low-income counties. Over the past several years, we have expanded and improved our fixed wireless network to reduce the number of customers we service using 900MHz spectrum, however, there are still approximately 350 customers who cannot be serviced reliably with another spectrum, or with wireline options, leaving them with only poor quality satellite Internet or expensive and restrictive cellular as an alternative. Many of those customers would not even have the option for cellular. We use both Vecima and Ubiquiti 900MHz equipment to service these customers. Due to the low population density of these customers, terrain and trees, 900MHz is the best solution for both Joink and our end users who enjoy reliable high speed Internet access because of this unlicensed band.

I have read through the test report that WISPA and Progeny jointly prepared and submitted to the FCC. While section 6 of the report is of great concern, I believe additional testing would show even more catastrophic problems for users of the 900MHz spectrum. I think testing of packet loss and latency would show significant increases in both when the Progeny equipment is turned on. Having packet loss, high latency or excessive jitter will make connectivity on 900MHz unreliable and unsuitable for today's Internet applications such as Voice over IP, video over IP, online education, remote desktop and other sensitive applications. In addition, I noticed the Progeny equipment is vertically polarized, whereas the Canopy equipment is horizontally polarized. This would be the best-case performance test. This is because most antennas have a 10-20 dB cross-polarization difference (vertical to horizontal). If the test was run with Canopy also being vertically polarized, the results would almost certainly be significantly worse.

Because of this jointly created test report, which I believe clearly and repeatedly demonstrates crippling interference from the Progeny system, I am certain our existing customers would suffer an unacceptable level of interference and that Progeny's system would increase the digital divide, stranding many citizens without reliable and affordable high speed Internet access.

Respectfully,

Connectivity Manager

Joink, LLC

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